



United States of America
Federal Trade Commission
Washington, D.C. 20580

Office of the Executive Director

June 28, 2013

Nancy Sutley, Chair
Council on Environmental Quality

Sylvia Mathews Burwell, Director
Office of Management and Budget

Dear Mmes. Sutley and Burwell:

The Federal Trade Commission hereby submits its 2013 Strategic Sustainability Performance Plan for the agency's Headquarters Building located at 600 Pennsylvania Avenue, NW, Washington, DC.

We will continue to stay apprised of developments in sustainable technology and initiative improvements based on economic and social benefits. We also will continue to report these improvements to your offices and to maintain transparency to the public.

Sincerely,

A handwritten signature in cursive script, reading "Steven A. Fisher for", is written over the typed name of Patricia F. Bak.

Patricia F. Bak
Acting Executive Director
Senior Sustainability Officer
Federal Trade Commission

CC: Jonathan Powers, Council on Environmental Quality
William Garvey, Council on Environmental Quality
Sally Ericsson, Office of Management and Budget
Cynthia Vallina, Office of Management and Budget

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Agency Policy Statement

The Federal Trade Commission (FTC) commits to compliance with all environmental and energy statutes, regulations, and Executive Orders. The FTC is dedicated to fostering a clean energy economy and to improving the environment by conducting its operations in a sustainable and environmentally responsible manner. In addition, as part of its core mission, the FTC supports investment by American consumers in *bona fide* green products and services. Specifically, through the issuance and update of its “Green Guides,” the FTC helps to ensure that the claims marketers make about the environmental attributes of their products are truthful and non-deceptive so that consumers can make informed decisions.

This report outlines our sustainability efforts at the agency’s Headquarters Building, which is located at 600 Pennsylvania Avenue, NW, Washington, DC.¹ The FTC currently maintains existing programs related to recycling of all paper, glass, aluminum cans, and plastics; using high efficiency fluorescent lighting; and providing motion sensitive lighting controls for all offices in our Headquarters Building. Even with these measures in place, the FTC realizes there are opportunities for further improvement. As set forth in further detail herein, the FTC’s sustainability priorities for the upcoming year as set forth in this plan consist of a continuation of the agency’s current efforts to improve operational efficiency to reduce environmental impact and overall cost to the agency.

Executive Summary

Sustainability and the Agency Mission

The mission of the FTC is to protect consumers and maintain competition in the American marketplace. Consumers are increasingly making purchasing decisions based on the environmental impact of products. As a result, marketers are making “green” claims about their products. The FTC continues to bring enforcement actions against marketers to weed out deceptive “green” claims and recently revised its “Green Guides” to marketers on how to avoid making such false or deceptive claims.

The agency’s plan to educate its staff regarding the impact their choices have on the environment and how the deleterious effects of those decisions may be lessened, along with improvements in the agency’s choice of purchased products and resources will help to reduce GHG emissions, without the need for additional funding or disruption of the agency’s mission work.

Leadership

In conjunction with the Office of the Executive Director (OED), the FTC has formed an Energy Reduction Team. The team, which consists of staff from the Office of the Chief Information Officer and the Administrative Services Office offices, are working to implement the three-pronged plan set forth herein.

Summary of Accomplishments

During these austere times, the FTC has nonetheless been able to accomplish the following and will continue to work to capitalize on these gains.

¹ Including two other buildings in Washington DC, each of the FTC’s other locations are in buildings leased through the General Services Administration (GSA) in Seattle, San Francisco, Los Angeles, Dallas, Atlanta, Chicago, Cleveland, and New York. In 2014, the National Capital Planning Commission and GSA will relocate FTC staff from the two GSA leased buildings in Washington DC into one GSA leased building at Constitution Center, located at 7th & D Streets, SW. The space the agency will occupy at Constitution Center will carry a LEED Gold rating.

•Increasing the efficiency of our existing infrastructure

The FTC has undertaken a project to refurbish the exterior doors to the Headquarters Building, which will result in both monetary and energy savings. This refurbishment will not only make the doors more secure, but will also reduce the loss of conditioned air.

Our facilities team has worked with the manufacturer of the agency's chillers and compressors to optimize the duty cycle of the building's cooling system. Savings from this effort will not only reduce energy consumption, but should also increase the life of the components. Each of these undertakings were accomplished without additional funds and without neglect or delay of the agency's on-going maintenance programs.

•Pursuing waste management strategies that include increased recycling

The FTC increased the amount of recycling collection containers in the common areas of the Headquarters Building. This has increased the recyclables collected throughout the building, thereby reducing our GHG Carbon footprint.

The FTC recently awarded a new document destruction contract. The previous contractor collected burn bags every week and incinerated sensitive information offsite. The new contractor will conduct shredding onsite, recycling the waste paper.

•Supporting green transportation and travel practices that reduce harmful emissions, increasing operational and fuel efficiency, and reducing nonrenewable fuel use

As further discussed in this Plan, to support Executive Order 13514 and further reduce the agency's Greenhouse Gas (GHG) emissions, the FTC will continue to encourage the use of mass transit, bicycles, carpooling and telework; the use of technology in lieu of travel by staff to participate in meetings and conferences whenever possible; and the purchase of energy efficient equipment and replacement parts for the Headquarters Building.

Currently, the FTC manages a Transit Subsidy Program (also known as SmartBenefits), which encourages Federal workers to use public transportation, thereby reducing traffic congestion and air pollution. Under the program, FTC employees can receive up to \$245 per month to pay for transportation costs getting to and from work (not including parking costs). The amount of the subsidy, which is established by Federal law, has changed over time. The Department of Transportation (DOT) administers the transit subsidy program for the FTC and distributes the subsidies to FTC employees. The agency's Scope 3 response includes the agency's baseline information regarding transit subsidy use by the agency's employees. With this data as a starting point, the FTC will initiate programs to further inform staff of the importance and impacts of commuting choices on the environment and measure its success in convincing additional staff to use mass transit to commute. The agency will also track the use of telework and a compressed schedule as a means by which to reduce GHG emissions.

The FTC continues to work to increase the use of technology throughout the agency to increase efficiency by installing state-of-the-art audio and video equipment at our headquarters and regional facilities. In May 2013, the Acting Executive Director instituted a new policy requiring staff to provide a written explanation when seeking authorization to travel why technology cannot be used in lieu of travel to participate in conferences or meetings. In 2014, the FTC will install new state-of-the-art teleconferencing equipment in the Constitution Center building to which nearly half of the FTC's Washington staff will be relocated. The FTC will determine the amount by which travel and associated costs have been reduced. Reduction in travel should reduce the agency's carbon footprint.

•Promoting water conservation through identification of water inefficiencies and implementation of water conservation projects

The FTC has committed to purchasing only electro-mechanical items with the highest efficiency ratings, and has begun installing low-flow water valves and high efficiency rated compressors for the HVAC equipment at the Headquarters Building. The FTC has also purchased new valves and equipment for all restroom sinks and toilets in the Headquarters Building. These new fixtures, plus the installation of a program to check for leaks throughout the building and the lowering of the water pressure to certain areas of the building, will reduce potable water waste. These changes can be tracked and have no negative impact on our operational budget since they involve the replacement of normal-wear items.

•Engaging employees, stakeholders, and the public on environmental issues through the execution of the agency’s mission to protect American consumers

The FTC’s latest revision to its “Green Guides” are designed to help to ensure that the claims marketers make about the environmental attributes of their products are truthful and non-deceptive. The “Green Guides,” which were first issued in 1992, have been revised by the FTC in 1996, 1998, 2010 and most recently again in 2012 to take into account changes in the marketplace. The revised Guides include:

- General principles that apply to all environmental marketing claims;
- How consumers are likely to interpret particular claims, and how marketers can substantiate these claims; and
- How marketers can qualify their claims to avoid concerns of deception.

Among other things, the revised Guides caution marketers not to make broad, unqualified claims that a product is “environmentally friendly” or “eco-friendly” because the FTC’s consumer perception study confirms that such claims are likely to suggest that the product has specific and far-reaching environmental benefits, which marketers may not be able to substantiate. The Guides contain new sections on: 1) certifications and seals of approval; 2) carbon offsets; 3) “free-of” claims; 4) “non-toxic” claims; and 5) “made with renewable materials” claims.

Evaluating Return on Investment

The FTC plans to look at newly developed sustainable technologies and take advantage of such technologies where appropriate. We will implement most of these enhancements using the agency’s normal repair and operations budget between 2013 and 2020.

Greenhouse Gas Reduction Goals

Under its Scope 2 submission, the FTC commits to a GHG reduction target of 4.4% of its current totals by 2020 for its Headquarters Building.

Plan Implementation

The Headquarters Building, originally named the Apex Building, was constructed in 1937. Due to the type and age of construction, there are limitations on the alternations that can be made to increase the efficiency of the building. For example, heat is supplied via steam pipes connected to the GSA steam plant. The agency found that producing its own heat would require a huge outlay of funds to purchase a connection to a natural gas line and to pay for required internal steam source infrastructure upgrades. When these costs were added to the increased cost of natural gas, it was determined that the investment simply was not feasible. Given these sorts of limitations, the FTC has pursued other means by which to garner environmental impacts through its three-part plan.

Part One of the Plan is to ensure that all FTC staff are aware of the resources available to them through the transit subsidy program. In addition to distributing enrollment forms, the agency will conduct an outreach campaign to educate staff on how using different forms of transportation, including mass transit, can reduce GHG emissions. We will also encourage use of alternative means for commuting, such as bicycles and carpools, and telework as a means by which to avoid commuting altogether.

Part Two of the Plan is to overlay GHG emission data on employee travel to show the environmental benefits of the use of teleconferencing and other technology in lieu of traveling to attend meetings and conferences. Redefining the old axiom *Time is Money* to *Time is Money and Energy*, the agency will engage in a campaign to demonstrate to staff not only the cost and time savings, but also the environmental benefits (reduction in GHG emissions) of using technology in lieu of travel. This program will evolve over the next several years.

Part Three of the Plan will investigate purchasing components that provide the greatest efficiency in the use of purchased resources, such as water, steam, and electricity. The FTC purchases replacement components each year consisting of water and steam valves and compressors for our HVAC system and other infrastructure. The FTC commits to purchasing replacement systems and parts based on their overall efficiency.

This three-pronged plan will garner gains as we continue to educate staff on GHG emissions and work to instill a “think before you use” approach to the use of resources. Implementation of the plan will not require increased funding or disrupt the FTC’s work. The goal is to have an educated staff that maintains an acute awareness of GHG emissions and the environmental consequences of the choices they make, whether it be conducting the mission work of the FTC, purchasing products used by the agency or simply getting to and from work or attending meetings and conferences.

Transparency

The FTC will continue to report these improvements to your offices while maintaining transparency to the public via our FTC.gov website.

Table 1: Agency Size and Scope**Summary of size and scope of the Federal Trade Commission operations**

Total # of Employees	1,200
Total Acres of Land Managed	0
Total # of Facilities Owned	0
Total # of Facilities Leased (GSA lease)	12
Total # of Facilities Leased (Non-GSA)	0
Total Facility Gross Square Feet (GSF)	305,782
Operates in # of Locations throughout U.S.	9
Operates in # of Locations outside of U.S.	0
Total # of Fleet Vehicles Owned	0
Total # of Fleet Vehicles Leased	3
Total # of Exempted-Fleet Vehicles (Tactical, Emergency, Etc.)	0
Total Operating Budget FY 2012 (\$MIL)	311.6
Total # of Contracts Awarded FY 2012	954
Total Amount of Contracts Awarded FY 2012 (\$MIL)	61.9
Total Amount Spent on Energy Consumption FY 2012 (\$MIL)	1.347
Total MBTU Consumed per GSF FY2012	46.58
Total Scope 1 & 2 GHG Emissions (Comprehensive) FY 2008 Baseline MMTCO ₂ e	5.546
Total Scope 1 & 2 GHG Emissions (Subject to Agency Scope 1&2 Reduction Target) FY 2008 Baseline MMTCO ₂ e	5.546
Total Scope 3 GHG Emissions (Comprehensive) FY 2008 Baseline MMTCO ₂ e	1.561
Total Scope 3 GHG Emissions (Subject to Agency Scope 3 Reduction Target) FY 2008 Baseline MMTCO ₂ e	1.561

Goals

- **Goal 1: Greenhouse Gas (GHG) Reduction**
 - Goal 1 Strategies – Scope 1 & 2 GHG Reductions
 - The FTC does not combust gasses; nor does it process wastewater or solid waste onsite. The agency does purchase electricity and steam for its Headquarters Building. The agency's Office of the Chief Information Officer (OCIO) is investigating the possibility of taking certain of the IT services currently supported by the agency's data center to the cloud, which efforts should reduce our overall electricity consumption and thereby reduce GHG emissions. Through green acquisitions and the purchase of highly efficient replacement components and use of virtualization, over time, the agency should also be able to reduce its costs and negative impact on the environment. Our goal is to reduce our GHG emissions 4.4% by 2020.
 - Goal 1 Strategies – Scope 3 GHG Reductions
 - The Energy Reduction Team is working on an educational campaign to encourage staff to use technology in lieu of travel to participate in meetings and conferences. The team will also be engaging staff on the environmental benefits of the use of mass transit, bicycles, carpooling, and telework as means by which to reduce or avoid generating carbon emissions. Currently 80% of the FTC's Washington, DC-based staff use some form of mass transit to commute to work each day. The agency will track its progress in obtaining further gains against this baseline. Further, the FTC will continue its efforts to reduce water use by purchasing low-flow valves and reviewing any bulk use of water at the facility.

- **Goal 2: Sustainable Buildings**
 - Increased the amount of recycling collection containers and awarded a new contract to recycle shredded sensitive information (the previous contract incinerated sensitive information offsite).
 - Reduced travel by expanding the use of the transit subsidy program, bicycles, carpooling, telework, and by encouraging the use of technology in lieu of travel to participate in conferences and meetings.
 - Installed low-flow water valves and high efficiency rated compressors for HVAC and other equipment.
- **Goal 3: Fleet Management**
 - The FTC realized a reduction in its overall vehicle inventory. The agency reduced the size of its fleet from four to three vehicles; one of the current vehicles is an alternative fuel use vehicle.
- **Goal 4: Water Use Efficiency & Management**
 - The agency has placed meters in the Headquarters Building to measure water use in each major portion of the facility. Working from the baseline, the agency will measure any savings garnered through introduction of low-flow valves and bulk use of water to care for plants and trees in the landscaped areas that surround the building. Through encouragement of the use of telework and compressed work schedules, the agency should be able to reduce its overall water usage, greenhouse gas emissions, and solid waste disposal from the Headquarters Building.
- **Goal 5: Pollution Prevention & Waste Reduction**
 - The FTC commits to continually reduce waste by reducing the use of printed paper, collecting more office recyclables, and diverting more construction and demolition waste from landfills by employing best management practices. We have purchased additional recycle bins for each floor of the Headquarters Building for easier collection of newspapers, aluminum cans, plastics, and glass.
- **Goal 6: Sustainable Acquisition**
 - The Energy Reduction Team works closely with the agency's Financial Management Office to procure only the most efficient products for all of our facilities. The agency views acquisition as the beginning of the process of total cost of ownership. Staff researches, not only the products, but also the vendors to ensure the best value for the government and the taxpayers.
- **Goal 7: Electronic Stewardship & Data Centers**
 - The FTC's OCIO is assessing the use of cloud services, to reduce cost and energy consumption. In the interim, the agency will utilize Green IT purchases to reduce its energy consumption, including the use of virtualization to reduce the number of servers.
- **Goal 8: Renewable Energy**
 - The Energy Reduction Team is reviewing emerging ideas and designs to determine the feasibility of their use at the Headquarters Building. While the Headquarters Building is a historic structure, the agency may nonetheless be able to accommodate a minimum level of renewable energy sources in the physical plant.

- **Goal 9: Climate Change Resilience**
 - **Climate Change Adaptation Plan**
 - The FTC will review, plan, and adapt its operations to address challenges posed by climate change. The agency will continue to reduce greenhouse gas emissions and thereby help to limit the impacts of climate change on the environment. Whenever possible, the FTC will follow the recommendations and strategies listed below.

From the Council on Environmental Quality Task Force

Recommendations

Make adaptation a standard part of Agency planning to ensure that resources are invested wisely and services and operations remain effective in a changing climate.

Ensure scientific information about the impacts of climate change is easily accessible so public and private sector decision-makers can build adaptive capacity into their plans and activities.

Align Federal efforts to respond to climate impacts that cut across jurisdictions and missions, such as those that threaten water resources, public health, oceans and coasts, and communities.

Develop a U.S. strategy to support international adaptation that leverages resources across the Federal Government to help developing countries reduce their vulnerability to climate change through programs that are consistent with the core principles and objectives of the President's new Global Development Policy.

Build strong partnerships to support local, state, and tribal decision makers in improving management of places and infrastructure most likely to be affected by climate change.

Strategies

Adopt Integrated Approaches: Adaptation should be incorporated into core policies, planning, practices, and programs whenever possible.

Prioritize the Most Vulnerable: Adaptation strategies should help people, places, and infrastructure that are most vulnerable to climate impacts and be designed and implemented with meaningful involvement from all parts of society.

Use Best-Available Science: Adaptation should be grounded in the best-available scientific understanding of climate change risks, impacts, and vulnerabilities.

Apply Risk-Management Methods and Tools: Adaptation planning should incorporate risk-management methods and tools to help identify, assess, and prioritize options to reduce vulnerability to potential environmental, social, and economic implications of climate change.

Apply Ecosystem-based Approaches: Adaptation should, where appropriate, take into account strategies to increase ecosystem resilience and protect critical ecosystem services on which humans depend, to reduce vulnerability of human and natural systems to climate change.